



MURIEL GOODE-TRUFANT  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

Marina Moraru  
Special Assistant Corporation Counsel  
Office: 212) 356-2456

December 23, 2024

**VIA ECF**

Hon. Paul A. Engelmayer  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *W.B. v. New York City Dep't of Educ.*, 24-cv-4541 (PAE)(GS)

Dear Judge Engelmayer:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request an extension of Defendant's time to respond to the Complaint, from December 24, 2024 to January 9, 2025. This is the second request for an extension, the first extension having been granted on August 27, 2024 (ECF 8). Defendant also respectfully requests that the joint status letter due December 24, 2024 be adjourned to January 9, 2025 as well. Plaintiff consents to these requests. Defendant has served a fully valued written offer of settlement on December 5, 2024, which Plaintiff is still considering. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice, conferences or even the need to file an Answer. The parties are hopeful this matter will be resolved as well.

Accordingly, Defendant respectfully requests that Defendant's time to respond to the complaint be extended to January 9, 2025, with a next joint status letter due that same date.

Thank you for considering these requests.

Respectfully submitted,


/s/ Marina Moraru

Marina Moraru, Esq.  
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)

GRANTED. The Court directs the parties to file a status update by January 9, 2025.

SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge

Dated: December 26, 2024  
New York, New York